## STATEMENT OF SUBSTANCE OF INTERVIEW

The substance of the telephone interview of July 14, 2005, is as stated in the Interview

Summary.

It is respectfully submitted that the instant STATEMENT OF SUBSTANCE OF

INTERVIEW complies with the requirements of 37 C.F.R. §§1.2 and 1.133 and MPEP §713.04.

## REMARKS

This Amendment, submitted in response to the Office Action dated July 25, 2005, is

believed to be fully responsive to each point of rejection raised therein. Accordingly, favorable

reconsideration on the merits is respectfully requested.

Claims 8, 15 and 17-19 are all the claims pending in the application.

**II.     Claim Rejections under 35 U.S.C. § 102**

Claim 8 has been rejected under 35 U.S.C. § 102(e) as being anticipated by Chen et al.

(U.S. Patent No. 6,195,694).

Chen is directed to a server for reconfiguring control of a subset of devices on one or

more kiosks. Chen teaches that in the past, kiosks were preprogrammed and defined to perform

particular tasks. Chen addresses this problem by managing the kiosks via a server. Therefore,

instead of requiring the kiosks to be preprogrammed, the server, which contains one or more

application files that the server serves to the one or more kiosks, need only be programmed.

Claim 8 recites "a plurality of printing stations with functions to **read digital image data**, to print the data by performing necessary **image processing** and to **transmit or receive** the image data."

The Examiner asserts that the kiosks 100 of Chen have the function to fax data and to print the faxed data and therefore teaches this aspect of claim 8.  However, there is no indication that the fax machine of Chen **reads digital** image data.  As discussed in Chen col. 15, lines 15-24, when selecting a fax function, a screen prompts a user to enter a fax number, enter the credit card, and put the **document** to be faxed in the document slot, and touch the OK button when ready.  Chen does not teach or suggest **reading digital image data**.  At most, Chen teaches the reading of document to be faxed, which is not digital image data.

The Examiner asserts that Fig. 6 discloses the claimed image processing, however, Fig. 6 discloses the execution of embedded control programs of a typical application configuring the kiosk.  Col. 9, lines 44-46.  There is no indication that any kind of image processing on the fax data (allegedly the digital image data) is performed in Chen.

Claim 8 further recites "a server for turning the image data, being transmitted from each printing station to the management system, to a **database and for storing the data**." The Examiner asserts that proxy server 195A transmits fax data from each kiosk to server 195 to a database for storing the fax data, citing col. 19, lines 24-40 in support.

The respective column and lines cited by the Examiner describe a proxy server 195A which is located closer to a kiosk than a server 195.  The proxy server 195A can send a request

to the server over a network 150 for many or all application files 175 that the kiosk may require according to a predefined schedule. However, there is no teaching or suggestion of turning the image data to a database and for storing the data, as recited in claim 8.

Claim 8 also recites "a currency processing unit, wherein said currency processing unit identifies currency inserted into the system, processes a cost to be charged to a client, and returns currency to the client." The Examiner asserts that since Chen discloses a cash dispenser 130 therefore, inherently one would recognize that the appropriate currency is returned to the user based on the fees and actual amount referenced by the user of the kiosk.

However, in order to rely upon the theory of inherency, the Examiner must show that the allegedly inherent characteristic *necessarily flows* from the teachings of the applied prior art. Contrary to the Examiner's assertions, merely because Chen discloses a cash dispenser does not mean Chen discloses "a currency processing unit, wherein said currency processing unit identifies currency inserted into the system, processes a cost to be charged to a client..."as recited in claim 8. In particular, Chen is directed to a system for banking, col. 6, lines 5-20, therefore, the dispensing of cash may operate similar to, for example, an ATM machine or a cash register. Such machines need not **identify** currency inserted into the system, **process a cost** to be charged to a client, and return currency to the client.

For at least the above reasons, claim 8 and its dependent claims should be deemed allowable.

### III.     Claim Rejections under 35 U.S.C. § 103

Claim 15 has been rejected under 35 U.S.C. § 103(a) as being unpatentable over Narayen et al. (U.S. Patent No. 6,035,323) in view of Kohda et al. (U.S. Patent No. 6,249,806).

Narayen discloses a method and apparatus for distributing digital media over a network. A collection of digital media is generated and transmitted from a client digital processing system to a server digital processing system. Media is pregenerated that is presentable to other client digital processing systems coupled to the network. See Narayen claim 1. For example, a photo album is created by a user from the user's home computer, then transmitted to a server which publishes the user's album as viewable HTML pages. Therefore, a user need not learn the HTML language, and multiple programs are not needed to publish pages on the Internet.

Claim 15 recites "a plurality of printing stations with functions to read digital image data, to print the data by performing necessary image processing and to transmit or receive the image data." The Examiner asserts that client computer systems 121, 125, 135, and 137 of Narayen teach the claimed plurality of printing stations and that any computer system, that can be considered a printing system, has the ability of performing the printing of the image data.

However, there is no indication that the client computer systems 121, 125, 135, and 137 perform image processing for the printing of digital image data. In particular, Narayen does not pertain to image processing as discussed above. Narayen merely distributes or publishes images from a digital acquisition device for viewing over a network.

Claim 15 further recites "a management system connected to each printing station via a network and used for identifying management data of each printing station and for distributing necessary data to each printing station." The Examiner asserts that the Internet service providers (ISP's) and the web server of Narayen teach the claimed management server. However, in Narayen, a connection between a client computer system and an ISP and web server is established when a user desires to create an online album. See Abstract. For example, client computer systems 121, 125, 135, and 137 do not appear connected to the ISP and web server unless a user at client computer system 121, 125, 135, or 137 desires to create or view an album. Therefore, a management system is not connected to each printing station.

The Examiner also asserts that Narayen discloses "identifying management data of each printing station," as recited in claim 15, citing col. 4, lines 27-32 and step 281 of Fig. 7 in support. The respective column and lines cited by the Examiner describes that the Internet refers to a network of networks which uses certain protocols such as TCP/IP and HTTP for HTML documents. Step 281 of Fig. 7 describes that the client system from which the album will be published, logs into a server system via a connection and this connection is typically via the Internet. Therefore, Internet protocols are used between the client system and the server system. However, there is no teaching or suggestion that a management system (allegedly the ISP's 105 and 107) **identifies** management data of each printing station.

Claim 15 also recites "wherein the image data turned to said database has image categories as attribute information, and wherein said attribute information further comprises a

name, an age, a sex, an occupation, an address and a telephone number of an owner of the image

data."

The Examiner concedes that Narayen does not teach this aspect of the claim and cites

Kohda to cure the deficiency. However, Applicant submits that the combination of Kohda with

Narayen is not obvious.

Kohda is directed to an apparatus and method for providing information about two-way

computer communication services. A plurality of user terminals regularly access Internet Relay

Chat (IRC) services, and also communicate with a service selecting host. The service selecting

host collects data from the plurality of user terminals. The collected data includes information

about the users at the user terminals and information about the user terminals activity in

accessing the IRC services. The service selecting host compiles and sorts the collected data to

provide the terminals with information which allows the users to more easily select sorted IRC

services. See Abstract. User data set 21 is stored in a user terminal and includes for example,

attribute data indicative of sex, age, occupation and hobby of the user.

However, there is no teaching or suggestion in the prior art that would motivate one of

ordinary skill in the art to combine the IRC service selection of Kohda with the digital image

distribution of Narayen. The Examiner's reasoning appears to merely be a result of

impermissible hindsight. In particular, merely because Kohda teaches that attribute information

is used to narrow down a selection of IRC services, does not teach "the image data turned to said

database has image categories as attribute information," as recited in claim 15.

For at least the above reasons, claim 15 should be deemed allowable.

## IV.    New Claims

Applicant has added claims 17-19 to provide a more varied scope of protection.  Claims

17-19 should be deemed allowable by virtue of their dependency to claim 8 for the reasons set

forth above.

## V.    Conclusion

In view of the above, reconsideration and allowance of this application are now believed

to be in order, and such actions are hereby solicited.  If any points remain in issue which the

Examiner feels may be best resolved through a personal or telephone interview, the Examiner is

kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue

Fee and the Publication Fee, to Deposit Account No. 19-4880.  Please also credit any

overpayments to said Deposit Account.

Respectfully submitted,

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